

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Eleven 10 LLC,)	Case No. 1:18-cv-2318-JG
)	
Plaintiff,)	
)	Judge James S. Gwin
vs.)	
)	
Zhongshan Mai Bu Mould Co., Ltd. et al.)	
)	
Defendants.)	

Request for Clerk's Entry of Default

Plaintiff Eleven 10 LLC respectfully requests that the Clerk enter default against defendant Zhongshan Mai Bu Mould Co., Ltd., dba FMA (“Zhongshan”).

Fed. Civ. R. 55(a) states: “When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.”

As evidenced by the affidavit of Eleven 10’s counsel, Matthew J. Cavanagh, attached hereto, Eleven 10 properly served Zhongshan with a copy of the summons and complaint on January 27, 2021. (Cavanagh Decl. ¶¶ 5-8; *see also* Proof of Service (ECF #11).) By rule, Zhongshan’s answer was due 21 days later, by February 17, 2021. Fed. Civ. R. 12(a)(1)(A)(i).

To date, despite receiving service of process and notice of this action against it, Zhongshan has not appeared in this action, and it has failed to plead or otherwise defend by the February 17, 2021 deadline. Thus, Zhongshan is in default.

Therefore, Eleven 10 asks that the Clerk enter default accordingly.

Respectfully submitted,

Dated: February 18, 2021

s/ Matthew J. Cavanagh

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